



# ***Physical Security***

**E. Burns**

- **Review of recommended NRC policy statements / current practices for access to DBT information for plant designers**
  - Clarifications needed
- **Other relevant citations**
  - NEI initiatives
- **Development plan for security feature assessment of design for non-LWR plant**
  - Importance of inherent and passive safety in design
  - Importance of slow response behavior
  - Understanding of site specific conditions that could influence physical module/plant design
- **Level of information needed in DC vs. COL**
- **Obtaining review and feedback on conceptual security vulnerability assessment during pre-application period**

- **Education on latest requirements**
- **Obtain access to information**
- **Incorporate insights into facility design**
- **Establish next steps for preapplication interactions**

### **Recent NRC Directives and Guidance**

- **Information Protection / Handling**
  - RIS 2002-15, "NRC Approval of Commercial Data Encryption Systems for the Electronic Transmission of Safeguards Information," August 28, 2002.
  - RIS 2003-08, "Protection of Safeguards Information from Unauthorized Disclosure," April 30, 2003.
  - SECY 2004-0191, "Withholding Sensitive Unclassified Information Concerning Nuclear Power Reactors from Public Disclosure," October 19, 2004 and SRM, November 9, 2004.
  - EA-04-190, "Order Imposing Requirements for the Protection of Certain Safeguards Information," November 5, 2004.
  - SECY 2005-0091, "Task Force Report on Public Disclosure of Security-Related Information," May 18, 2005 and SRM, June 30, 2005.

### **Recent NRC Directives and Guidance (Cont'd)**

- **Interim Compensatory Measures**
  - EA-02-026, "Order for Interim Safeguards and Security Compensatory Measures," February 25, 2002.
  - EA-05-084, "Order for Interim Safeguards and Security Compensatory Measures," May 5, 2005.
- **Design Basis Threat**
  - EA-03-086, "Order Modifying Licenses," (Revised Design Basis Threat Requirements) April 29, 2003; FRN 68 FR 24517, May 7, 2003.
  - SECY 2005-0106, "Proposed Rulemaking To Revise 10 CFR 73.1, Design Basis Threat (DBT) Requirements," June 14, 2005.

### **Recent NRC Directives and Guidance (Cont'd)**

- **Access Authorization**
  - EA-02-261, (compensatory measures (CMs) related to Access Authorization Orders) January 7, 2003.
  - EA-05-085, “Order for Implementation of Additional Security Measures Associated with Access Authorization,” May 5, 2005.
  - “Broadening Scope of Access Authorization and Facility Security Clearance Regulations; Final Rule,” 70 FR 30224, June 2, 2005.
  - RIS 2005-14, “Clarification of Implementing Guidance for Compensatory Measures Related to Access Authorization Orders,” July 21, 2005.

### **Recent NRC Directives and Guidance (Cont'd)**

- **Physical Security Measures**

- RIS 2002-12A, "NRC Threat Advisory and Protective Measures System - Power Reactors," August 19, 2002.
- RIS 2003-05, "Issuance of Orders Imposing Additional Physical Protection Measures for Independent Spent Fuel Storage Installations Using Dry Storage," March 19, 2003.
- RIS 2003-06, "High Security Protected and Vital Area Barrier/Equipment Penetration Manual," March 20, 2003.
- IN 2005-20, "Electrical Distribution System Failures Affecting Security Equipment," July 19, 2005.

### **Other Relevant Documents**

- **NUREG-0794, “Protection of Unclassified Safeguards Information”**
- **NUREG/BR-0069, “NRC Classification Guide for National Security Information Concerning Nuclear Materials and Facilities**
- **NUREG/BR-0252, “Users Guide to Physical Protection Documents Published by the NRC”**
- **IMC 2201, “Security and Safeguards Inspection Program For Commercial Power Reactors”**
- **IMC 8100, “Physical Security”**
  - **Inspection Procedures (numerous)**



- **NRC Form 237, “Request for Access Authorization”**
- **SF-312, “Classified Information Nondisclosure Agreement”**
- **Establish lead-time relative to available design information**
- **Determine available access channels to minimize handling complexities with foreign-based design**

## Step 3 – Incorporate Insights

### Incorporate insights into facility design

- Gain insights into post 9/11 enhanced physical security requirements having potential implications for plant design features and layout, for which early resolution during the design stage would result in improved and cost-efficient design solutions.
  - “The Commission, in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 73.21(c)(1) has authorized the staff to offer prospective applicants for design certification, access to certain safeguards information (SGI). In particular, the Commission has authorized the release of the February 25, 2002, interim compensatory measures (ICMs) for power reactors and relevant portions of the April 29, 2003, revision of the design basis threat (DBT) issued by orders to licensees of all operating reactors.”

[NRC letter to GE, August 11, 2003]

- **Determine PBMR safeguards and security organizational structure**
- **Obtain access to necessary information**